

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

WALTER LEE;	)	
	)	
Plaintiff,	)	No. 07 C 2035
	)	
vs.	)	Judge Lindberg
	)	
THE CITY OF CHICAGO, A Municipal	)	Judge Magistrate Keys
Corporation; and Chicago Police Officers	)	
CHRIST SAVICKAS, Star 5991, ROBERT	)	Jury Demand
STEGMILLER, Star 18764, SEAN	)	
BRANDON, Star 18866, ISAAC LEE JR,	)	
Star 10353, COURTNEY HILL, Star 12283,	)	
TERRENCE MORRIS, Star 16465,	)	
CORNELIUS BROWN, Star 2235, LEVI	)	
ROBERTS, Star 12313, WILLIAM LAMAR,	)	
Star 9865, DENNIS HINES SR, Star 4086,	)	
and ANDREW SCHOEFF, Star 1249,	)	
	)	
Defendants.	)	

**OFFER OF JUDGMENT**

Defendants, Christ Savichas, Robert Stegmiller, Sean Brandon, Isaac Lee, Courtney Hill, Dennis Hines, Terrence Morris, Cornelius Brown, Andrew Schoeff, Levi Roberts, and William Lamar ("Defendant Officers"), by and through one of their attorneys, Matthew R. Hader, Assistant Corporation Counsel for the City of Chicago, and Defendant, City of Chicago ("Defendant City"), by and through its attorney, Mara S. Georges, Corporation Counsel for the City of Chicago, and pursuant to Fed. R. Civ. P. 68, jointly make the following offer of judgment to Plaintiff, Walter Lee:

1. Defendant City and Defendant Officers offer to allow judgment to be taken against them and in favor of Plaintiff, Walter Lee, in the total amount of TWENTY

THOUSAND AND ONE DOLLAR AND NO/100 (\$20,001.00), plus reasonable attorney's fees and costs accrued prior to the date of this offer in an amount to be determined by the Court.

2. This offer of judgment is inclusive of all claims plaintiff has or may have against the City of Chicago, Defendant Officers, and any other current or former employees or agents of the City of Chicago arising from the incident or injuries alleged in Plaintiff's Third Amended Complaint.

3. Pursuant to Fed. R. Civ. P. 68, an offer not accepted within ten (10) days after service of the offer shall be deemed withdrawn and evidence thereof is not admissible except in a proceeding to determine costs.

4. This offer must be accepted by Plaintiff against all Defendants in this matter. Acceptance of this offer of judgment by Plaintiff against fewer than all Defendants shall be deemed a rejection of this offer.


Dated this 10th day of July, 2008.

Respectfully submitted,

Mara S. Georges  
Corporation Counsel

By:

  
MEGAN MCGRATH  
Assistant Corporation Counsel

  
MATTHEW R. HADER  
Assistant Corporation Counsel  
Attorney for Defendants


30 North La Salle Street  
Suite 1400 / Suite 1020  
Chicago, Illinois 60602  
(312) 742-9586 / (312) 744-8369

**CERTIFICATE OF SERVICE**

I hereby certify that I have caused a true and correct copy of the above and foregoing **OFFER OF JUDGMENT** to be hand delivered to the following person:

**Lawrence V. Jackowiak  
Louis J. Meyer  
Law Offices of Lawrence V. Jackowiak  
20 N. Clark Street, Suite 1700  
Chicago, IL 60602  
(312) 795-9595**

on this 10th day of July, 2008.

  
MATTHEW R. HADER  
Assistant Corporation Counsel

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(312) 742-9586  
Atty. No. 06284330